

5. Attached hereto as Exhibit D is a true and correct copy of Linnette Sun's October 13, 2011 cover document for her production of documents in response to Baxter's First Set of Requests for Production of Documents.

6. Attached hereto as Exhibit E is a true and correct copy of the October 20, 2011 letter from Baxter's counsel to Relators' counsel notifying them of deficiencies in the Sun production and interrogatory responses.

7. Attached hereto as Exhibit F are true and correct copies of representative examples of emails that are missing attachments from Sun's October 13, 2011 document production.

8. Attached hereto as Exhibit G are true and correct copies of representative examples of emails referring to Sun's consulting work from Sun's October 13, 2011 document production.

9. Attached hereto as Exhibit H are true and correct copies of LS-DFP1- 503 through 504 from Sun's October 13, 2011 document production.

10. Attached hereto as Exhibit I is a true and correct copy of LS-DFP1-000110 from Sun's October 13, 2011 document production.

11. Attached hereto as Exhibit J are true and correct copies of LS-DFP1-111 through 113 from Sun's October 13, 2011 document production.

12. Attached hereto as Exhibit K is a true and correct copy of a November 2, 2011 email from me to Lauren Udden, counsel for Relators, copying his co-counsel Mark Kleiman.

I hereby swear that the foregoing statements are true to the best of my knowledge, information, and belief.

Dated: November 4, 2011

/s/ Tina Reynolds
Tina Reynolds
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Washington, DC 20006
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Counsel for Defendant Baxter Healthcare
Corporation

CERTIFICATE OF SERVICE

I hereby certify that I, Tina D. Reynolds, an attorney, caused a true and correct copy of the foregoing **DECLARATION OF TINA D. REYNOLDS IN SUPPORT OF BAXTER HEALTHCARE CORPORATION'S MOTION TO COMPEL RESPONSES TO INTERROGATORIES AND THE PRODUCTION OF DOCUMENTS** to be delivered to all counsel of record by electronic service via LexisNexis File & Serve, on November 4, 2011, for posting and notification to all parties.

/s/ Tina D. Reynolds
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